

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**VS.**

**SUMMER HEATHER WORDEN**

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**CASE NO. 4:20-CR-00125**

**UNOPPOSED MOTION FOR CONTINUANCE**

Defendant, Summer Heather Worden, moves this Court to continue the scheduling order for a period of at least nine months or a later time more convenient to the Court's calendar. In support of this request, counsel states the following:

- 1) Jury Selection and Trial are currently set for November 4, 2024 at 9:00 AM.
- 2) Counsel for the Defense is set to begin trial in the Northern District of Atlanta in United States of America v. Roscoe McMillan on October 29, 2024. The McMillan trial is not anticipated to be concluded until after the instant trial is scheduled to begin.
- 3) The Defense discussed this continuance with Government counsel who is unopposed to the requested continuance.
- 4) Because of the schedule of a key witness for the government in this matter, the parties request that the trial not be scheduled until July 2025 or afterwards.
- 5) The Defense makes this motion in the interest of justice and not for the purpose of delay and agrees that any delay caused by the granting of this motion is excludable under the Speedy Trial Act.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that pretrial deadlines, and jury selection and trial be reset for a date consistent with the above-request and this Honorable Court's calendar.

Respectfully submitted,

**COGDELL LAW FIRM, PLLC**

**/s/ Dan L. Cogdell**

Dan L. Cogdell

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**ATTORNEY FOR SUMMER HEATHER WORDEN**

**CERTIFICATE OF CONFERENCE**

Counsel for Defendant has conferred with counsel for the Government on October 17, 2024, AUSA's Richard Hanes and Tyler White, and they are unopposed to this Motion for Continuance.

/s/ Dan Cogdell

DAN COGDELL

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded to all attorneys via the Court's electronic notification system on this the 17<sup>th</sup> day of October 2024.

/s/ Dan Cogdell

DAN COGDELL